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Attorney for Defendant Joanna Perez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a Pre-Plea Pre-Sentence Investigation Report be prepared by the Probation department.

1) It appears that defendant has no criminal history and may be eligible for a sentence outside the applicable United States Sentencing Guideline (U.S.S.G.) range pursuant to U.S.S.G. § 5C1.2, 18 U.S.C § 3553(f) and U.S.S.G. § 2D1.1(b)(6). Whether the defendant is eligible for the Safety Valve will drastically impact her sentencing exposure, negotiations, and client's decision as to how she should proceed. A pre-plea presentence report will promote judicial economy and aid in the manner in which this case is ultimately resolved.

1 2) Undersigned counsel therefore respectfully requests an order that the Department of
2 Probation conduct a pre-plea presentence investigation report as soon as possible.

3 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney
4 Robert Knief regarding this request and he has no opposition.
5

6 DATED this 5th day of February, 2013.

7
8 /s/Phil Brown
9 PHIL BROWN, ESQ.
10 200 HOOVER AVE, UNIT #130
11 LAS VEGAS, NEVADA 89101
12 ATTORNEY FOR THE DEFENDANT
13 SCOTT WEST
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA)
Plaintiff,)
vs.)
ROBERT PEREZ, et. al.,)
Defendant.)
)
)
)
)
)
CASE NO.: 2:12-CR-360
ORDER GRANTING DEFENDANT
JOANNA PEREZ'S MOTION FOR
PRE-PLEA PRESENTENCE REPORT

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence Investigation Report on Defendant Joanna Perez.

DATED this the 22nd day of February, 2013.

U.S. DISTRICT JUDGE
MAGISTRATE

1
2 CERTIFICATE OF SERVICE
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4 The undersigned hereby certifies that he is an employee of Brown Law Offices,
5 Chartered, and is a person of such age and discretion as to be competent to serve papers.

6 That on February 5, 2013, he served an electronic copy of the above and foregoing
7 UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING
8 INVESTIGATION REPORT by electronic service (ECF) to the person named below:

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10
11 DANIEL BOGDON
12 United States Attorney

13 ROBERT KNIEF
14 Assistant United States Attorney
15 333 Las Vegas Blvd. So., 5th Floor
16 Las Vegas, NV 89101

17
18 /s/ Philip H. Brown

19 Employee of Brown Law Offices, Chartered
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